

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

Svetlana Lokhova,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:20-cv-1603 (LMB)(TCB)
)	
Stefan A. Halper,)	
)	
Defendant.)	

**DEFENDANT HALPER’S CONSENT TO PROCEED WITH THE
CURRENT MOTION TO DISMISS**

Defendant Stefan Halper responds to this Court’s Order of earlier today (Docket No. 53) seeking notification “whether he intends to proceed with the current Motion or file a revised one based on the Amended Complaint.” *Id.*

Defendant Halper gives notice of his consent to proceeding with the current motion to dismiss (Docket Nos. 47 to 47.5) as being applicable to, and dispositive of, the Amended Complaint (Docket No. 52).

Respectfully submitted,

By: ____/s/_____
Terrance G. Reed (VA Bar No. 46076)
Lankford & Reed, PLLC
120 N. St. Asaph St.
Alexandria, VA 22314

(Phone) : 703-299-5000
(Facsimile) : 703-299-8876
tgreed@lrfirm.net

Robert D. Luskin (*pro hac vice*.
granted April 1, 2021)
Paul Hastings LLP
875 15th ST NW
Washington, DC 20005
202-551-1966
202-551-0466
robertluskin@paulhastings.com

Counsel for Defendant
Stefan A. Halper

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of June, 2022, I electronically filed the foregoing Notice using the CM/ECF system which will then send a notification of such filing (NEF) to all interested parties.

By: ____/s/____